

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor,

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

LEGACY CAPITAL LTD. and KHRONOS LLC,

Defendants.

SIPA LIQUIDATION

No. 08-01789 (SMB)

(Substantively Consolidated)

Adv. Pro. No. 10-05286 (SMB)

**STIPULATION AND ORDER EXTENDING THE TIME FOR DEFENDANTS
LEGACY CAPITAL LTD. AND KHRONOS LLC TO REPLY TO THE
TRUSTEE'S OPPOSITION TO DEFENDANTS' MOTIONS TO DISMISS**

WHEREAS, on July 30, 2015, defendants Legacy Capital Ltd. ("Legacy") and Khronos LLC ("Khronos"), in accordance with the deadline set by a prior stipulation so-ordered by the Court, each filed a Motion to Dismiss the Amended Complaint filed by Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC (the "Trustee") [Docket No. 112] (the "Motions");

WHEREAS, on August 27, 2015, the Trustee, in accordance with the deadline set by a prior stipulation so-ordered by the Court, filed a consolidated Opposition to Defendants' Motions.

NOW THEREFORE, in consideration of the foregoing recital, which is incorporated into this Stipulation, and the covenants and conditions contained therein,

IT IS STIPULATED AND AGREED, by and between the Trustee, Legacy and Khronos as follows:

1. The date by which Legacy and Khronos shall file their replies to the Trustee's Opposition is extended through and including September 18, 2015.

2. The hearing on the Motions shall be October 28, 2015, at 10:00 a.m., in accordance with the deadline set by a prior stipulation so-ordered by the Court.

3. This Court shall retain jurisdiction to hear all matters or disputes arising from or related to this Stipulation and Order.

4. This Stipulation and Order may be executed in multiple counterparts, each of which will be deemed an original, and all of which when taken together shall constitute one and the same document.

5. This Stipulation and Order will be effective immediately upon approval by the Court.

6. Each person who executes this Stipulation and Order on behalf of a Party hereto represents that he or she is duly authorized to execute this Stipulation and Order on behalf of such Party.

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LLC and the estate of Bernard L. Madoff*

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Attorneys for Defendant Khronos LLC

SO ORDERED:

Dated: New York, New York

September 3rd, 2015

/s/ STUART M. BERNSTEIN
United States Bankruptcy Judge